

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK

KRISTINA SARHADI,

Plaintiff,

- against -

**JUSTIN CATHAL GEEVER a/k/a
JUSTIN SANE, and HARDWORK
DISTRIBUTION, INC., and DOE 1,**

Defendants.

Civil Action No. 1:24-cv-00031 (BKS/CFH)

**NOTICE OF MOTION FOR DEFAULT
JUDGMENT**

PLEASE TAKE NOTICE upon the Amended Complaint filed on March 14, 2024, the declaration of John F.O. McAllister, Esq. dated January 30, 2025 together with the exhibits thereto, the accompanying Memorandum of Law, the Certificate of Service of the Summons and Amended Complaint, the Certificate of Default filed by the Clerk of Court, the Proposed Default Judgment, and all prior proceedings had herein, a motion will be made by Plaintiff, Kristina Sarhadi, before Hon. Brenda Sannes, Chief U.S. District Judge for the U.S. District Court for the Northern District of New York, Federal Building and U.S. Courthouse, P.O. Box 7336, Syracuse, New York 13261-7336, for an Order: (1) granting Plaintiff's Motion for Default Judgment against Defendant Justin Cathal Geever a/k/a Justin Sane pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure; and (2) for such further relief as this Court may deem just and proper.

Dated: New York, New York
January 30, 2025

Respectfully submitted,

McALLISTER OLIVARIUS

/s/ John F.O. McAllister

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on January 30, 2025 a true and correct copy of Plaintiff's Motion for Default Judgment was delivered via certified mail to:

Justin Cathal Geever
8036 Thompson Run Rd
Pittsburgh, PA 15237

Dated: January 30, 2025

/s/ John F.O. McAllister

John F.O. McAllister